THE HONORABLE JOHN H. CHUN 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 IN RE: APPLICATION OF SAILED Case No.: 2:22-cv-01396-JHC TECHNOLOGY (BEIJING) CO LTD 10 FOR AN ORDER TO TAKE DISCOVERY STIPULATED MOTION TO CHANGE PURSUANT TO 28 U.S.C. § 1782, THE NOTING DATE AND BRIEFING 11 SCHEDULE FOR SAILED TECHNOLOGY'S AMENDED MOTION 12 FOR DISCOVERY FOR USE IN FOREIGN PROCEEDINGS PURSUANT 13 TO 28 U.S.C. 1782 [DKT. 33] 14 **NOTE ON MOTION CALENDAR:** 15 **DECEMBER 22, 2022** 16 17 Pursuant Local Civil Rules 7(j) and 10(g), Applicant Sailed Technology (Beijing) Co., 18 Ltd. ("Applicant") and Respondents Amazon.com, Inc. and Amazon.com Services, LLC (collectively, "Amazon") hereby stipulate and respectfully move to change the noting date for 20 21 Applicant's Amended Application for U.S. Discovery for Use in Foreign Proceedings Pursuant 22 to 28 U.S.C. § 1782 (Dkt. 33) ("Amended Application") by two weeks to January 20, 2023 from the present noting date of January 6, 2023. Amazon will file its response to the Amended 23 Application by January 12, 2023, and Applicant will file its reply, if any, by January 20, 2023. 24 Good cause exists for this limited extension to avoid the necessity of briefing over the holidays. 26 27 28 STIPULATED MOTION TO CHANGE 1 FENWICK & WEST LLP

STIPULATED MOTION TO CHANGE NOTING DATE CASE NO.: 2:22-CV-01396-JHC

1	Dated:	ted: December 22, 2022 Respectfully submitted,			
2			FENWICK & WEST LLP		
3					
4	By: <u>/s/ Jeffrey Ware</u>				
5	Ravi Ranganath (admitted <i>pro hac vice</i>) Fenwick & West				
6			801 California St Mountain View, CA 94041		
7	7 650-988-8500				
8			Todd R Gregorian (admitted <i>pro hac vice</i>)		
9			Fenwick & West 555 California St, 12th Floor		
10			San Francisco, Ca 94104 415-875-2300 Email: tgregorian@fenwick.com		
12			Jeffrey Ware (WSBA No. 43779)		
13			FENWICK & WEST LLP 1191 Second Avenue, 10th Floor		
14			Seattle, WA 98101 Telephone: 206.389.4510 Facsimile: 206.389.4511		
15			Matthew Becker (admitted <i>pro hac vice</i>)		
16			FENWICK & WEST LLP 555 California Street, 12th Floor		
17			San Francisco, CA 94104 Telephone: 415.875.2300		
18			Facsimile: 415.281.1350		
19			Attorneys for Defendants Amazon.com, Inc. and		
20			Amazon.com Services LLC		
21	Dated:	December 22, 2022			
22					
23			By: /s/ Carmen E. Bremer		
24			Carmen E. Bremer, WSBA #47565		
25			BREMER LAW GROUP PLLC Email: cbremer@bremerlawgroup.com		
26			1700 Seventh Avenue, Suite 2100 Seattle, WA 98101		
27			Tel: (206) 357-8442 Fax: (206) 858-9730		
28	STIPULA	ATED MOTION TO CHANGE	James R. Klaiber (<i>pro hac vice pending</i>) 2 FENWICK & WEST LLP		
	NOTING		1191 Second Avenue, 10th Floor Seattle, Washington 98101		

1		Emma L. Baratta (<i>pr</i> Lynn M. Russo (<i>pro</i>	
2		HUGHES HUBBAR One Battery Park Pla	RD & REED LLP
3		New York, NY 1000 Telephone: (212) 83)4 7-6000
4		Facsimile: (212) 422 james.klaiber@hugh	eshubbard.com
5		emma.baratta@hugh lynn.russo@hughesh	esnubbard.com lubbard.com
7		James Canfield (<i>pro</i> HUGHES HUBBAR	hac vice pending) CD & REED LLP
8		1775 I Street, N.W., Washington, DC 200	6th Floor 006-2401
9		Telephone: (202) 72 Facsimile: (202) 721	-4646
10		james.canfield@hug	nesnubbard.com
11		Attorneys for Applic Sailed Technology (1	ant Reijing) Co. Ltd
12		Suited Technology (I	Jeijing) Co., Liu
13			
14			
15			
16			
17			
18 19			
20			
21			
22			
23			
24			
25			
26			
27			
28		2	_
	STIPULATED MOTION TO CHANGE	3	FENWICK & WEST LLP

STIPULATED MOTION TO CHANGE NOTING DATE CASE NO.: 2:22-CV-01396-JHC

1 ORDER 2 IT IS HEREBY ORDERED that the stipulated motion is GRANTED. The Note on 3 Motion Calendar for Applicant's Amended Application for U.S. Discovery for Use in Foreign Proceedings Pursuant to 28 U.S.C. § 1782 (Dkt. 33) ("Amended Application") is now January 4 5 20, 2023. The deadline for Respondents Amazon.com, Inc. and Amazon.com Services, LLC to file their response to the Amended Application is January 12, 2023. Applicant Sailed 6 7 Technology (Beijing) Co., Ltd. may file a reply, if any, by January 20, 2023. 8 DATED: December 22, 2022 John M. Chan 10 11 HONORABLE JOHN H. CHUN UNITED STATES DISTRICT COURT JUDGE 12 13 Presented by: FENWICK & WEST LLP 14 15 By: /s/ Jeffrey Ware 16 17 Ravi Ranganath (admitted *pro hac vice*) Fenwick & West 801 California St 18 Mountain View, CA 94041 650-988-8500 19 rranganath@fenwick.com 20 Todd R Gregorian (admitted *pro hac vice*) Fenwick & West 21 555 California St, 12th Floor San Francisco, Ca 94104 22 415-875-2300 Email: tgregorian@fenwick.com 23 Jeffrey Ware (WSBA No. 43779) 24 FENWICK & WEST LLP 1191 Second Avenue, 10th Floor 25 Seattle, WA 98101 Telephone: 206.389.4510 26 Facsimile: 206.389.4511 27 Matthew Becker (admitted *pro hac vice*) FENWICK & WEST LLP 28 STIPULATED MOTION TO CHANGE 1 FENWICK & WEST LLP

STIPULATED MOTION TO CHANGE NOTING DATE CASE NO.: 2:22-CV-01396-JHC

Case 2:22-cv-01396-JHC Document 35 Filed 12/22/22 Page 5 of 5

555 California Street, 12th Floor San Francisco, CA 94104 Telephone: 415.875.2 Facsimile: 415.281. 415.875.2300 415.281.1350 Attorneys for Defendants Amazon.com, Inc. and Amazon.com Services LLC

STIPULATED MOTION TO CHANGE NOTING DATE

CASE NO.: 2:22-CV-01396-JHC